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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

The Use of N11 Codes and Other  
Abbreviated Dialing Arrangements

)  
) CC Docket No. 92-105  
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Comments of the  
INFORMATION INDUSTRY ASSOCIATION

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**Comments of the  
INFORMATION INDUSTRY ASSOCIATION**

<sup>1</sup>The Use of N11 Codes and Other Abbreviated Arrangements, CC Docket No. 92-105 (released May 8, 1992) ("N11 Codes Proceeding").

IIA believes that abbreviated dialing can play an important role in simplifying and easing access to enhanced services. Such expedited access can encourage the acceptance of new and existing enhanced services for American business and consumer users.<sup>2</sup> Despite the long-term success of abbreviated dialing -- including "411," "911," and "0" -- which have demonstrated the value of short, easily recognizable number assignments linked to a particular service, the dearth of resources mandates other alternatives.<sup>3</sup>

N11 codes are especially important because they are a limited resource. Consequently, IIA strongly favors the allocation of N11 codes on the basis of their application or purpose instead of to a particular provider. This will facilitate fair distribution of these numbers on a national basis. Such an application-based approach admittedly expands the scope of the instant proceeding beyond three-digit dialing. However, IIA believes that these issues are far too important not to merit thorough consideration.<sup>4</sup>

On the basis of existing usage in various parts of the country, only six N11 combinations could be set aside for specialized service designations.<sup>5</sup> Indeed, the

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<sup>2</sup>IIA recognizes that the advances in customer premises equipment means that residential, cellular and other telephone users have access to equipment with speed-dialing or other connecting shortcuts. However, the variety of enhanced services, offered on local, regional and national levels, weighs heavily in favor of a consistent number interface for access to these services.

<sup>3</sup>Nationally, there is a movement by the regional bell operating companies away from the use of "411" and to seven digit telephone directory information (e.g., BellAtlantic and U S West).

<sup>4</sup>N11 Codes Proceeding at 3, fn. 2. The Commission has made other investigations into abbreviated dialing schemes; that work should be incorporated into this proceeding.

<sup>5</sup>The available combinations are "211," "311," "511" and "711." As noted in the NPRM, "611" and "811" are designated for telephone company use in certain regions of the country.

availability of these numbers is far more sparse than the electromagnetic spectrum. Therefore, IIA has concluded that these codes should be used as service access codes to increase their availability from a mere six numbers to up to 10,000 per code when based on application and used in a seven digit assignment scheme.<sup>6</sup>

Using N11 as an access code allows these combinations to be designated as access numbers for information, personal or other enhanced services.<sup>7</sup> Such allocation should be based on national guidelines that promote diversity and consistency for businesses and consumers across the country. These new numbers -- "N11-XXXX" or "(N11)-XXX-XXXX" -- should be assigned within a scheme that assures uniform access by all interested providers. Allocation of these codes by local exchange carriers ("LECs") would not guarantee national consistency in their use and assignment. It also could place LECs in the unfair position of deciding the best allocation methods for equity and the public interest. These codes should be allocated 1) on a fair and equitable basis that guarantees the same competitive advantages to all players, and 2) under a rational plan that makes these codes consistently available nationally. Premature assignment to a single company or group of interests will only prejudice future businesses that may offer valuable contributions to the information industry.

IIA acknowledges there is a growing shortage of North American Numbering Plan allocations and potential exhaustion of the current numbering plan area supply. Yet, it is almost impossible to expect that any business will invest resources in

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<sup>6</sup>Long-term and widespread of "411" and "911" combinations for rate based directory information and emergency services, respectively, merit preserving these numbers for such purposes.

<sup>7</sup>This applies to "211," "311," "511," "611," "711," and "811," to the extent they are available.

building awareness of a particular service and associated telephone number if that number is subject to summary withdrawal or discontinuation. Such action by Bellcore acting under the direction of the Administrator of the North American Numbering Plan, or others, will be detrimental to investment in new enhanced services and ultimately, will delay the deployment of nationwide abbreviated dialing services. Certainty in this new form of access requires that the Commission preserve N11 numbers, once they have been assigned, from being withdrawn from enhanced service providers and reassigned to basic telephone numbers.<sup>9</sup>

IIA is convinced that whether on the basis of a numbering plan allocation ("N11-XXX-XXXX") or "NXX" scheme ("N11-XXXX"), national numbering is attainable and would be an asset for the information industry and all Americans. The Association also recognizes that a numbering scheme does not, and should not, automatically determine a particular access arrangement. However, the Commission should be cautious that creation of a nationally accessible numbering scheme should not discriminate in availability of services or with regard to charges for access arrangements. Regardless of the central office configuration used, abbreviated dialing should not necessarily be equated to Feature Group B or D access or special access charges for "950-XXXX" or "800-XXX-XXXX" and rates applied to N11 dialing arrangements should fairly based upon directly associated costs.

The role of Bell Communications Research ("Bellcore") activities in the planning and assignment of numbers is of concern to IIA members. The Commission should send a strong signal to the North American Numbering Plan managers that any use and distribution of numbers should be accomplished in an equitable fashion.

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<sup>9</sup>Such certainty logically would not apply to Commission-approved sale or transfer of such numbers.

Although the instant proceeding raises the issue of the availability of access to N11 numbers, the possibility of other three-digit, abbreviated numbers should not be overlooked. Under the current North American Numbering Plan few combinations may actually be available, but the Commission should weigh the value of requiring the reservation of other number combinations that could be used in a similar fashion. Further, the Commission should require local exchange companies, under the guidance of Bellcore and with industry input, to implement alternative abbreviated dialing plans for local and regional services. Regionally, a large number of variations are possible, and to the extent they are available, such numbers should be accessible for businesses and consumers.

Conclusion

IIA commends the Commission for moving expeditiously in this matter, proceeding with the benefit of comment from the industry. Although three digit dialing through the use of N11 exchanges can provide competitive access to a variety of information services in a simplified and easily remembered consumer format, adoption of a three digit assignment scheme using these codes would only serve to limit the vast capability of nationally accessible information services. IIA urges the Commission to adopt rules, and institute further rulemaking procedures as appropriate, that will assure that these important resources are offered in the public interest.

Respectfully submitted,

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